

### **REMARKS**

Claims 1-4 and 6-16 remain pending in the present application. Claims 1 and 11 have been amended. Basis for the amendments can be found throughout the specification, claims and drawings as originally filed.

Applicant believes that the reply filed October 21, 2003 (mailed October 15, 2003) overcame the rejections under 35 U.S.C. § 112.

### **REJECTION UNDER 35 U.S.C. § 103**

Claims 1-5 and 6-16 are rejected under 35 U.S.C. § 103(a) as being unpatentable over Brunson in view of Brault, et al. (U.S. Pat. No. 5,819,624). Applicant's position is that both of our levers are pivotably connected to the table where in Brault, et al., one lever is pivotably connected while the locking rod (handle 222, rod 218, bearing rod 190 and locking bracket 166) in Brault, et al. is rotatably not pivotably connected to the table.

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In order to better distinguish the present invention over the combination of Brunson in view of Brault, et al., Claims 1 and 11 have been amended to define the two pivot axes of the present invention as being generally parallel. Applicant believes this clearly distinguishes over the combination of Brunson in view of Brault, et al. Brunson fails to disclose the spacing between the first and second pivot axes. Brault, et al. discloses a pivot axis and a rotation axis that are spaced, but these two axes are generally perpendicular and not generally parallel as defined by amended Claims 1 and 11.

Thus, Applicants believe Claims 1 and 11, which define spaced and parallel axes, patentably distinguish over the art of record. Likewise, Claims 2-4, 6-10 and 12-16 which ultimately depend from one of these independent claims also patentably distinguish over the art of record. Reconsideration of the rejection is respectfully requested.

#### CONCLUSION

It is believed that all of the stated grounds of rejection have been properly traversed, accommodated, or rendered moot. Applicant therefore respectfully requests that the Examiner reconsider and withdraw all presently outstanding rejections. It is believed that a full and complete response has been made to the outstanding Office Action, and as such, the present application is in condition for allowance. Thus, prompt and favorable consideration of this amendment is respectfully requested. If the Examiner believes that personal communication will expedite prosecution of this application, the Examiner is invited to telephone the undersigned at (248) 641-1600.

Respectfully submitted,

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